

**REMARKS**

Claims 1-16, 19-22, and 25-28 are pending and at issue in the above-referenced patent application. In the official action dated May 20, 2003, claims 1-5, 7-16, 19, and 20 were rejected as obvious over Leyden (U.S. Patent No. 4,455,464) (hereinafter '464 patent) in view of one or more of Leyden et al. (U.S. Patent No. 5,421,667) (hereinafter '667 patent), Inoue et al. (U.S. Patent No. 5,570,080), and Keiger et al. (U.S. Patent No. 5,146,205). By way of this amendment, claims 1-16, 19, and 20 have been amended, and claims 25-28 have been added. The foregoing rejections are respectfully traversed and reconsideration is respectfully requested.

With regard to the indefiniteness rejections under 35 U.S.C. § 112, second paragraph, the applicants have amended claims 1-16. More specifically, claims 1-16 have been amended to more clearly indicate the claimed subject matter. The indefiniteness rejections noted on pages 2 and 3 of the official action should therefore be withdrawn.

Turning now to the prior art rejections, the applicants respectfully traverse the rejection of claims 1-5, 7-16, 19, and 20 as obvious over the '464 patent in view of one or more of the '667 patent, Inoue et al., and Keiger et al.

Independent claim 1, as well as the dependent claims therefrom, specifies, *inter alia*, a mounting assembly including a shroud having a seat configured to receive a security sensor with a sensor cable and a passage configured to carry the sensor cable, and a fastener configured to extend through the shroud and into a product to secure both the security sensor and the shroud to the product so that the security sensor is captured between the product and the shroud. No such structure is taught or suggested in the cited references.

As set forth in detail below, none of the cited references discloses or suggests the use of a shroud having a seat configured to receive a security sensor with a sensor cable and a passage configured to carry the sensor cable. Further, none of the cited references discloses

or suggests the use of a fastener configured to extend through the shroud and into a product (e.g., a camera or a camcorder) to secure both the security sensor and the shroud to the product so that the security sensor is captured between the product and the shroud. Because none of the cited references makes such a disclosure, no combination of these references, even if there were motivation for such a combination, can result in the claimed apparatus.

It was acknowledged in the official action dated May 20, 2003 that the '464 patent fails to disclose a fastener configured to extend through a shroud and into a product to secure both a security sensor and the shroud to the product, much less, a fastener configured to capture the security sensor between the product and the shroud. In addition, the '464 patent also fails to suggest the use of a shroud having a seat configured to receive a security sensor with a sensor cable and a passage configured to carry the sensor cable.

Although the '464 patent generally suggests an alarm system sensing and triggering apparatus for remote detection of interruptions or alterations in a closed electrical alarm circuit, the '464 patent does not disclose a shroud having a seat configured to receive a security sensor with a sensor cable and a passage configured to carry the sensor cable, and a fastener configured to extend through the shroud and into a product to secure both the security sensor and the shroud to the product so that the security sensor is captured between the product and the shroud. Instead, the '464 patent discloses an alarm system including a sensor housing 4 carrying exposed electrodes 6, a current conducting means 7 comprising a substantially deformable material 8 (e.g., a substantially polyurethane charcoal polyester foam), and a sensor attachment ring 12 fastened to a surface of an article 11. *See, e.g.,* the '464 patent, col. 5, lines 3 - 34. The alarm system disclosed in the '464 patent is activated when a closed electrical circuit formed between the exposed electrodes 6, the current conducting means 7, and the sensor attachment ring 12 is opened. When the article 11 is removed from the sensor housing 4, for example, an electrical conducting surface 9 of the

current conducting means 7 is also removed because the current conducting means 7 is attached to the sensor attachment ring 12. Accordingly, the electrical conducting surface 9 is no longer in contact with the exposed electrodes 6, and therefore, the closed electrical circuit is broken. Because the exposed electrode 6 forms the closed electrical circuit with the current conducting means 7 and the attachment ring 12, a sensor cannot be placed in a cavity portion 5 of the sensor housing 4. Thus, a sensor cable of the sensor cannot be carried in the sensor housing 4 in the disclosed system of the '464 patent. Further, the '464 patent fails to solve or address the problem solved by the recited apparatus as described in detail below because the sensor attachment ring 12 is attached to the article 11 with the adhesion means 13. *See, e.g.*, the '464 patent, col. 5, lines 35 – 39.

While the '667 patent discloses an apparatus for connecting a security cable to a product, the '667 patent does not disclose or suggest a shroud having a seat configured to receive a security sensor with a sensor cable and a passage configured to carry the sensor cable. The '667 patent also fails to disclose or suggest a fastener configured to extend through the shroud and into a product to secure both the security sensor and the shroud to the product so that the security sensor is captured between the product and the shroud. Rather, the '667 patent merely discloses a solid body 26 attached to a product 22 and to one end 34 of a cable 24 while the other end 90 of the cable 24 is attached a shelf 14, 16 via an anchor 92. *See, e.g.*, the '667 patent, FIGs. 1 and 4; col. 3, lines 18 – 30; col. 3, lines 40 – 43; and col. 5, lines 1 – 8. Nor does the '667 patent disclose or suggest any need or advantage to secure the product by preventing a sensor cable and/or a cable connector of a security sensor from being damaged and/or tampered (e.g., cutting the sensor cable and/or disconnecting the cable connector).

The remaining references do not overcome the deficiencies of the above-noted references. Keifer et al. is directed to a security and display system for use with a retail item

having a switching device 37 that is attached to a retail item by an adhesive. *See, e.g.*, Kiefer et al., col. 5, lines 7 – 12; and FIG. 1. Inoue et al. is directed to a tag device 61 that is attached to an article 69 by the adhesive tape 62. *See, e.g.*, Inoue et al., col. 5, lines 39 – 54; and FIG. 7. Even assuming, *arguendo*, that Keifer et al. and Inoue et al. disclose such features, it is respectfully submitted that they fail to disclose or suggest the use of a shroud having a seat configured to receive a security sensor having a sensor cable and a passage configured to carry the sensor cable. Both Keifer et al. and Inoue et al. also fail to disclose or suggest the use of a fastener configured to extend through the shroud and into a product to secure both the sensor and the shroud to the product so that the security sensor is captured between the product and the shroud. Accordingly, the obviousness rejections based thereon should be withdrawn.

It is well established that the prior art must teach or suggest each of the claim elements and must additionally provide a suggestion of, or an incentive for, the claimed combination of elements to establish a *prima facie* case of obviousness.<sup>1</sup> Because none of the cited references discloses or suggests the use of a shroud having a seat configured to receive a sensor with a sensor cable and a passage configured to carry the sensor cable, and a fastener configured to extend through the shroud and into a product to secure both the sensor and the shroud to the product so that the security sensor is captured between the product and the shroud, it follows that no combination of these references renders the pending claims obvious.

---

<sup>1</sup> See *In re Oetiker*, 24 U.S.P.Q. 2d 1443, 1446 (Fed. Cir. 1992); *Ex parte Clapp*, 227 U.S.P.Q. 972, 973 (Bd. Pat. App. 1985); *In re Royka*, 490 F.2d 981 (CCPA 1974) and M.P.E.P. § 2143.

For at least the foregoing reasons, it is respectfully submitted that claims 1-16, 19-22, and 25-28 are in condition for allowance. If, for any reason, the examiner is unable to allow the application in the next Office action, the examiner is encouraged to telephone the undersigned attorney at the telephone number listed below to discuss this matter.

Respectfully submitted,

Dated:

9/12/03

Frankie Ho

Frankie Ho  
Reg. No. 48,479  
Attorney for Applicants  
GROSSMAN & FLIGHT, LLC  
20 North Wacker Drive, Suite 4220  
Chicago, IL 60606  
Tel: (312) 580-1020  
Fax: (312) 580-9696